

MEREDITH &
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MEMO ENDORSED

April 7, 2008

VIA FACSIMILE
(212) 805-6724Hon. Frank Maas
United States Magistrate Judge
United States District Court, SDNY
500 Pearl Street, Room 740
New York, New York 10017-1312*Counsel are directed to
appear, as previously directed,
on 4/16/08 at 2pm.**Maas, USMJ,
4/16/08*Re: Wang et. al. v. CYR International, Inc. et al, 07 Civil Action Number 05462
(BSJ)(FM)

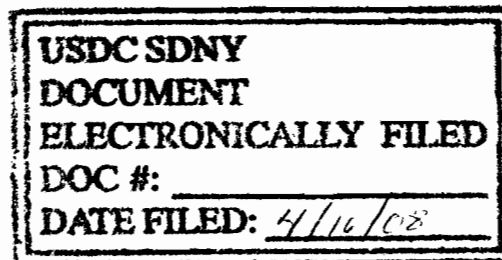
Dear Judge Mass:

We represent the Plaintiffs in the above referenced matter. On December 18, 2008 Plaintiffs' served their First Request for the Production of Documents and Things and First Set of Interrogatories. These requests were directed at eliciting facts relevant to the dispositive issues of liability and damages of Defendants in this case. Responses to Plaintiffs' discovery requests were due by January 20, 2008, but Defendants produced no responses. On February 2, 2008 I emailed Defendants' counsel requesting immediate compliance with their discovery obligations. I followed-up with numerous phone calls leaving voice mail messages and then again with a follow-up email on March 13, 2008 where I indicated that Plaintiffs would be seeking the Court's intervention if Defendants did not comply with their obligations immediately. Soon thereafter Defendants' counsel contacted Plaintiffs promising immediate compliance, but again has failed to do so.

Now for over two and a half (2.5) months Defendants' responses to Plaintiffs' discovery requests are past due and have been ignored in entirety after Plaintiffs have made numerous follow-up phone calls and emails with no avail. To date there has been no production of any documents or things in this case or any responses to Plaintiffs' interrogatories.

Plaintiffs respectfully request a conference with Court on this matter pursuant to Local Civil Rule 37.2 and/or leave to file a motion to compel pursuant to Rule 37(a) of Federal Rules of Civil Procedure.

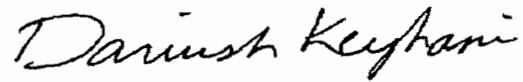
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Respectfully submitted,

A handwritten signature in black ink that reads "Dariush Keyhani". The script is cursive and fluid.

Dariush Keyhani*

cc: via facsimile

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Daniel K. Lee, Esq. (201) 947-2114

* Admitted before the Southern, Eastern, and Western Districts of New York, New Jersey District Court and the New Jersey Bar-not a member of the NY State Bar